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Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

JUN 30 1994

VALLEY COMMUNICATIONS CENTER

In the matter of Allocation of)
Spectrum Below 5 GHz)
Transferred from Federal)
Government Use)

ET Docket No. 94-32

REPLY COMMENT OF VALLEY COMMUNICATIONS CENTER - 911

VALLEY COMMUNICATIONS CENTER submits the following reply comments in response to the above captioned Notice of Inquiry.

Respectfully Submitted by:

Chris Fischer
Director of Communications

June 28, 1994

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Valley Communications Center is filing reply comments in support of a spectrum allocation for the private land mobile community. Recent action by the FCC in the form of a Notice of Inquiry (N.O.I.) [ET Docket No. 94-32] addressed a petition for rule making that was filed by the Coalition of Private Users of Multimedia Technologies, (hereinafter referred to as C.O.P.E.) requesting additional spectrum for emerging private radio technology operations.

The N.O.I. requested comments and reply comments on spectrum in the bands 2390-2400 MHz, 2402-2417 MHz and 4660-4685 MHz. These bands have severe limitations for usage according to information contained in comments filed in regard to this proceeding and the NTIA Preliminary Spectrum Reallocation Report. Current operations in neighboring bands would hinder wide area, full power applications. Also, wide band applications are necessary to send video that is a proposed private advanced emerging technology application.

As stated in our comments filed in this proceeding, Valley Communications Center (Valley Com) is an integrated public safety 911 dispatch center that serves a 230 square mile area in suburban King County south of Seattle. Valley Com provides public safety communications systems and services to 6 cities and several fire districts for a total of 16 police, fire and EMS agencies. The total population served is approximately 250,000 and this area of south King County is one of the fastest growing regions in the state. Total dispatched calls for service are increasing at a rate of 5% per year and last year a total of 213,000 emergency responses were handled from the Center.

There is an obvious need for additional private spectrum as there are shortages of spectrum in the bands below 800 MHz as is defined in the refarming proceeding (Docket 92-235), and a shortage of available 800 MHz channels in at least the top 22 metropolitan areas and the top 10 metropolitan areas at 900 MHz.

Reliable, privately operated radio communications systems are the lifeblood of the public safety community. It is critical to the public interest that an allocation of additional spectrum for advanced private radio communications systems occur in order that we can provide these extremely necessary services to the public.

Valley Com utilizes a number of radio communications systems to meet the needs of our public safety agencies, but are unable to provide emerging multimedia technologies due to the lack of available spectrum. These technologies are viewed as essential by our agencies as they seek ever improved ways to deliver service to the citizens and protect the safety of our public safety employees.

We envision future spectrum needs to include wide band, wide area applications such as the transmission of mug shots, finger prints, etc., to and from law enforcement personnel both locally and nationally in order to be fully tied to the National Crime Information Center (NCIC 2000) system that the FBI is implementing. We also envision access by fire fighters and emergency medical personnel to information such as building plans and locations of hydrants, hazardous materials, etc., as well as communications related to patient care with medical facilities or poison control centers. All of these enhance our public safety effectiveness.

Additional spectrum allocations are necessary to support the numbers of private land mobile radio transmitters that will be operating in the United States through the turn of the century. Industry figures show an increase in the number of transmitters from one million units in 1958 to over 17,000,000 units operating today. Projections show that the number of transmitters will continue to grow to over 34,000,000 in less than eight years.

Emerging Technologies allocations to date have primarily addressed public offering systems such as PCS. Private spectrum allocations for emerging technologies must occur in order that internal systems, with unique needs that carrier offered systems may not fulfill, can be met. Issues that need to be considered in developing internal systems are coverage (which may be outside of a carrier's license authorization or offered service area), system performance and user prioritization.

Valley Com supports a request for additional spectrum for wide band applications and other emerging multimedia technologies for the private radio and specifically for public safety communications systems. We ask the Commission to allocate spectrum that will easily accommodate emerging technology applications as early as possible.